

Region 9 Enforcement and Compliance Assurance Division

Inspection Date(s):	11/8/2022	Inspection Announced: No	
Time:	Entry: 8:55 AM	Exit: 2:00 PM	
Media:	Air		
Regulatory Program(s)	Stationary Source, CAA Title V, NESHAP Subparts A and AAAA		
Company Name:	Waste Management		
Facility or Site Name:	Waste Management Disposal & Recycling Services Inc. (Bradley Landfill & Recycling Center)		
Facility/Site Physical Location:	9227 Tujunga Avenue		
(city, state, zip code)	Sun Valley, CA 91352		
Geographic Coordinates:	(Latitude, Longitude) 34.2394, -118.3846		
Mailing address:	9227 Tujunga Avenue		
(city, state, zip code)	Sun Valley, CA 91352		
County:	Los Angeles County		
Facility/Site Contact:	Amanda Duchesne	Air Quality Manager	
	aduchesn@wm.com ; 646-346-9422		
Facility/Site Identifier:	(FRS ID) 110009544500		
Media Number:	(ICIS-Air) CASCA00006037CC932		
NAICS:	562212		
SIC:	4953		
Facility/Site Personnel Participating in Inspection:			
Amanda Duchesne	Waste Management	Air Quality Manager	aduchesn@wm.com ; 646-346-9422
Thomas Sandhu	Waste Management	Air Compliance Specialist	tsandhu@wm.com ; 818-602-1979
Kevin Vaughn	Waste Management	MRF Operations Manager	kvaughn3@wm.com ; 747-215-0039
Marc Harismendy	Waste Management	MRF District Manager	mharisme@wm.com ; 626-224-9854
Phil Perley	Waste Management	Sr. District Manager Closed Sites	pperley@wm.com ; 818-298-4683
Christian Colline	Waste Management	Air Director	ccolline@wm.com ; 925-890-2746
Inspector(s):			
Janice Chan	EPA R9 / ENF2-1	Senior Enforcement Officer	Chan.Janice@epa.gov / 415-972-3308
Scott Connolly	EPA R9 / ENF2-1	Senior Environmental Engineer	Connolly.Scott@epa.gov
Inspection Report Author:	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">JANICE CHAN</h1> </div> <div style="text-align: right;"> Digitally signed by JANICE CHAN Date: 2022.12.16 14:35:54 -08'00' </div> </div>		
Janice Chan	EPA R9 /ENF-2-1	Senior Enforcement Officer	Chan.Janice@epa.gov / 415-972-3308
Supervisor Review:	<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">Chew, Andrew</h1> </div> <div style="text-align: right;"> Digitally signed by Chew, Andrew Date: 2022.12.19 13:14:04 -08'00' </div> </div>		
Andrew Chew for Roshni Brahmabhatt	EPA R9 / ENF-2-1	Air Section Manager	Brahmbhatt.Roshni@epa.gov / 415-972-3995

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of this on-site Inspection at Waste Management Disposal & Recycling Services Inc. at Bradley Landfill & Recycling Center (“Bradley Landfill” or “the Facility”) was to determine the facility’s compliance with applicable stationary source regulatory requirements and prohibited acts promulgated through the Clean Air Act (CAA). The inspection was a full compliance evaluation (FCE) and unannounced.

Opening Conference

EPA Region 9 inspectors Janice Chan and Scott Connolly (collectively “the Inspection Team”) arrived at the Facility at 8:55 am on November 8, 2022, for the inspection. We signed-in at the visitor logbook and met with Kevin Vaughn. We showed our credentials and explained the CBI policy. Marc Harismendy joined the inspection.

Tom Sandhu joined the inspection to discuss the landfill operation.

The Facility/site description is based on interviewing facility representatives during the inspection.

Facility/Site Description

The Facility comprises of a recycling facility, a landfill, a gas collection and control system, and a landfill transfer station. The recycling facility is a materials recovery facility (“MRF”), which started operations in 2020. The Facility sorts 10 recycling categories, including carboard, paper, scrap metal ferrous and non-ferrous, aluminum, 1-7 plastics, fibers, wood, and glass.

The Facility takes organic food waste and green waste, which it chips and grinds. The Facility sends the organic and green waste to compost sites, as there is no composting onsite.

The Facility’s landfill closed in 2007. When it closed, the Facility stopped accepting waste, and put a cap on the wells. Waste Management still collects solid waste here, and transfers it to other Waste Management landfills in the area. The highest elevation of the landfill is 1,008 feet, with 62,202,575 tons of waste in place. The landfill has 248 active wells.

The Facility used to have a gas-to-energy operation, but it stopped the operation due to low concentrations, which were unable to meet State regulations. The landfill gas is typically 33% methane. The Facility’s Gas Collection and Control System became fully operational in 1981. The flare station replaced the gas-to-energy operation.

The Facility has two flares. Flare 1 is the main flare, which replaced the original flare in 2001. Flare 3 is the backup flare, and was installed in June 1997. The Facility decommissioned Flare 2, as it is the oldest flare onsite. The flare operates 24/7, and all the landfill gas goes to the flare. The Facility has its contractor, Alliance, conduct source testing on the flares. Flare 1 has source testing every year. Flare 3 has source testing every 2 years.

The Facility conducts quarterly surface monitoring and ambient air monitoring through its contractor, RES Environmental. The Facility also performs monthly perimeter monitoring and quarterly penetration monitoring. It uses the GEM 5000 for methane detection on wells, and a TVA for quality surface monitoring. The Facility conducts monthly temperature readings of its wells, where they note the temperature never goes above 145-degrees Fahrenheit. The highest reading has been 142-degrees Fahrenheit.

SECTION II – OBSERVATIONS

Amanda Duchesne, who was the Facility's the previous site manager, and Tom escorted the Inspection Team on a tour of the landfill.

The Inspection Team looked at Flare 1. During the inspection, the gas flow was approximately 2900-2985 SCFM, 5000 BTU, temperature was at 1634-degrees Fahrenheit, and at 44293.3 hours of run time. The minimum temperature was set at 1481-degrees Fahrenheit. The Inspection Team observed potential emissions at the condensate knock-out tank or valve upstream of Flare 1 on the FLIR camera, but was unable to verify on monitoring equipment due to rain.

After touring the landfill, the Inspection Team joined Marc, Kevin, Amanda, and Tom on a tour of the MRF. We started the tour at the transfer station, where the Facility sorts trash and recycling. The Facility transfers the trash to another landfill offsite, and the Facility transfers the recycling to the recycling facility onsite.

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

The Inspection Team noted the potential emissions at the condensate knock-out tank/valve upstream of Flare 1 as a potential area of concern, though we were unable to verify due to the rain. The Inspection Team recommended to the Facility to consider looking at the flare station when there is no rain activity.

Closing Conference

The closing conference started at approximately 1:30 pm. Kevin, Amanda, and Tom participated in the closing conference. Phil Bradley and Christian Colleen participated by phone. The Facility claimed customer names and supplies as CBI.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

The Inspection Team was able to use the FLIR camera for only a portion of the tour. The Inspection Team was unable to use the TVA.

SECTION V – DOCUMENTS REQUESTED AND RECEIVED

- 1) Quarterly surface monitoring records for past year (received by email while onsite)
- 2) Last source test reports for Flare 1 and Flare 3 (received by email while onsite)
- 3) Last 2 years of reports on flare breakdown and maintenance repair (received by email while onsite)
- 4) Map of the facility (received by email on 11/9/2022)

SECTION VI – LIST OF APPENDICES

None